IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

IN RE:

CASE NO.: 11-04894 MCF

ZULMA CECILIA GONZALEZ TORRES

***-**-5440

CHAPTER 13

DEBTOR

STIPULATING AGREEMENT SURRENDER OF SAVINGS AND DIVIDENDS

TO THE HONORABLE COURT:

NOW COMES, the Government of Puerto Rico Employees' Association, hereinafter "AEGPR", and Debtor, through the undersigned Attorneys who respectfully **STATE AND PRAY**:

- 1. Debtor is indebted to AEGPR in the amount of \$12,504.39.
- 2. On September 9, 2011, a "Proof of Claim" was filed claiming the indebted amount.
- 3. AEGPR is the holder of a consensual and statutory lien against Debtor based in Commonwealth of Puerto Rico's Act No. 133 of June 28, 1966 and Act No. 125 of July 1st, 1967, 3 LPRA Sections 862f, 863, 863c, 863 and 703d, which guarantees the payment of the debt.
- 3. By the present agreement, Debtor surrenders to AEGPR the amount of \$9,252.01, which corresponds to savings and dividends debtor has deposited with AEGPR, in partial payment of the debt. Bankruptcy Law Section 1325(a)(5)(C) permits the debtor to surrender the collateral to the holder of the claim.
- 4. This agreement does not waive any right to which AEGPR is entitled by law.
- 5. The Trustee has been served and notified of the present stipulated agreement.

WHEREFORE it is respectfully requested of this Honorable Court to take notice of the aforementioned and approves the present stipulated agreement.

Notice: All creditors and parties in interest are being notified that if no objection is filed within ten (10) days, as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P.9006 (f) if you were served by mail, from the date of this motion, the present Motion may be approved by the Court without further notice or hearing.

CERTIFICATE OF SERVICE: I hereby certify that on this date, I electronically filed the above document with the Clerk of the Court using the CM/ECF System which sends a notification of such filing to all parties in this case registered for receipt of notice by electronic mail. I further certify that the foregoing document has been served and notified to the U. S. Trustee at ustpregion21.hr.ecf@usdoj.gov, the Chapter 13 Trustee, Jose Ramon Carrion Morales at newecfmail@ch13-pr.com.

In San Juan, Puerto Riço, this September 19, 2012

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IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

CERTIFICATE OF INDEBTEDNESS

I, SYLVIA RAMOS, Director of the Collections Department of the Asociacion de Empleados Del Estado Libre Asociado de Puerto Rico, CERTIFY that Debtor, GONZALEZ TORRES ZULMA, Social Security Number XXX-XX-5440 had deposited with said institution the amount of \$9,252.01 in savings and dividends as of June 07, 2011.

I also certify that the outstanding balance of loans of said Debtor with Asociación de Empleados Del ELA was \$12,504.39 , as of June 07, 2011.

In San Juan, Puerto Rico, this 20 day of June, 2011.

SYLVIA RAMOS

Director

Collections Department Asociación De Empleados

Del E.L.A. de PR

Telephone: (787)641-4075.

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ZULMA CECILIA GONZALEZ TORRES ALTS DE HATO NUEVO 13 CALLE RIO BLANCO GURABO, PR 00778-8402

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